

1 Name: TODD MICHAEL SCHULTZ

2 Address: 818 N DOHENY DR. #1108

3 WEST HOLLYWOOD, CA 90069

4 Phone: 310-435-5847

5 In Pro Per

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8 **UNITED STATES DISTRICT COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA**

10 TODD MICHAEL SCHULTZ

11 Plaintiff

12 CASE NUMBER:

13 2:23-CV-03452-JAK-MRWx

14 To be supplied by the Clerk of

15 The United States District Court

16 MICHAEL C. THOMPSON

17 GREGORY R. HOLMES

18 YOUTUBE LLC

19 **MOTION FOR LEAVE TO AMEND**

20 **COMPLAINT**

21 Defendant(s).

22 PLEASE TAKE NOTICE that Plaintiff, Todd Michael Schultz, in Pro Per, has dispatched

23 service of the THIRD AMENDED COMPLAINT as filed on Monday June 26 at 11:33 pm. Upon

24 the filing of the executed summons for the defendants Thompson, Holmes and Youtube, Plaintiff

25 moves this court for an ORDER allowing for a FOURTH AMENDED COMPLAINT to be filed. I

26 ask that the court ORDER give leave, upon successful service of summons to all parties, leave to

27 amend to file a FOURTH AMENDED COMPLAINT. Due to the following mistakes made on

28 THIRD AMENDED COMPLAINT filed Tuesday June 26th at 11:33 pm:

1) Plaintiff did not provide, nor did he intend to provide, exhibits for THIRD

AMENDED COMPLAINT, thus, in a corrected version, any verbiage suggesting the

Attachment of exhibits and the mention of said exhibits will be removed.

2) The word “Facebook’s” was used mistakenly for the word “Youtube’s” on pg.14, ¶30. Plaintiff acknowledges this was a mistake and seeks to retract the accidental allegation. It was merely a typo, as one might say.

3) Pagination. Plaintiff fixed the pagination (i.e. page numbers) to be centered at the bottom of each page, per the court's instruction.

4) The twitter account @laughingstock is incorrect. The correct name for the mentioned account mentioned on page 10 (¶24) is “@HWLaughingstock”.

Plaintiff acknowledges his errors and asks the court humbly to grant a FOURTH AMENDED COMPLAINT that may be served electronically upon filing of executed summons for all parties. Plaintiff does not believe the erroneous aspects of the original filed THIRD AMENDED COMPLAINT change the basic information or summary of facts and that defendants are welcome to the exhibits mentioned in aforementioned complaint upon request and in discovery.. Plaintiff asks the court to give leave to file a FOURTH AMENDED COMPLAINT, to be delivered to Defendant's counsels electronically via email. Plaintiff thanks the court for guidance on forthcoming ORDER.

Dated: Thursday, June 29, 2023

Signed by:

Todd Michael Schultz
(Plaintiff)

